

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

## UNITED STATES DISTRICT COURT

for the

Northern District of Ohio



Sarah Hutchens

Plaintiff

v.

John Doe

Defendant

Civil Action No.

5 : 22 MC 36

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Meta Platforms, Inc., Attn: Facebook Records Custodian, 1 Hacker Way, Menlo Park, California, 94025

(Name of person to whom this subpoena is directed)

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attached.

Place: William H. Corgan, Esq.  
Weisensell, Mastrantonio & Niese, LLP

Date and Time:

July 21, 2022 at 5:00pm EST

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 06/30/2022

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Sarah Hutchens

, who issues or requests this subpoena, are:

William H. Corgan, Esq., Weisensell, Mastrantonio & Niese, LLP, 23 S. Main St., Ste 301, Akron, OH 44308,  
WHCorgan@nwm-law.com, (330)376-5756

## Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

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Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
\_\_\_\_\_ *Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

**(A) When Required.** On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

**(B) When Permitted.** To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

## FACEBOOK

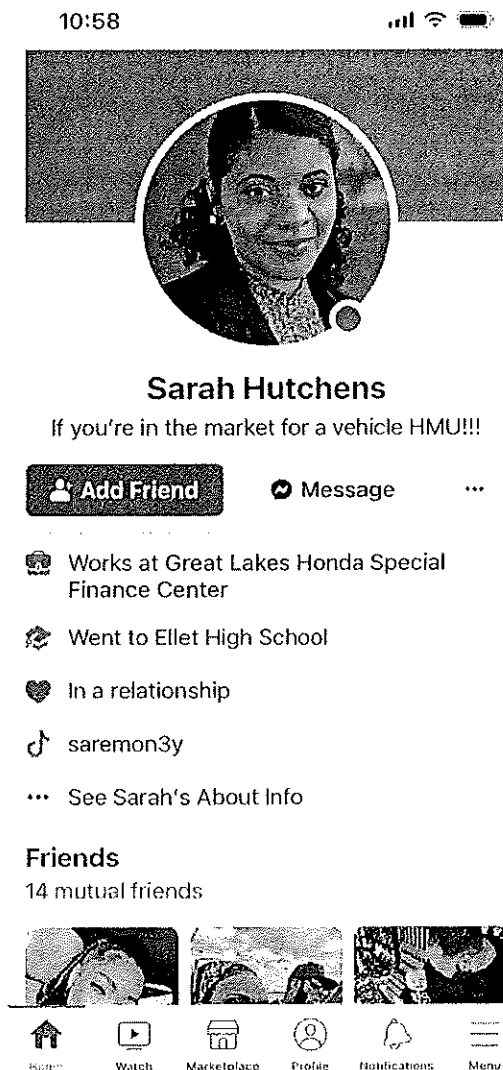
Produce all identifying information, including but not limited to names, addresses telephone numbers, e-mail addresses, ip addresses, ip providers, any meta data involving accounts that would lead to discovery of the identity of the person or persons who created, used, maintained, authorized or had control over the following accounts on your social media platform. Those accounts, and information to help you locate them are as follows:

Identity Impersonator Account#1:

<https://www.facebook.com/profile.php?id=100079685897628>

It appears this account was created March 28, 2022 and was active until at least May 9, 2022.

Screenshots from that profile:



1:04



< Sarah Hutchens



Sarah Hutchens



Add Friend



Message



Works at Great Lakes Honda Special Finance Center



Went to Ellet High School



In a relationship



[onlyfans.com/iphonemytits](https://onlyfans.com/iphonemytits)



See Sarah's About Info

Friends



Home



Friends



Watch



Marketplace



Notifications



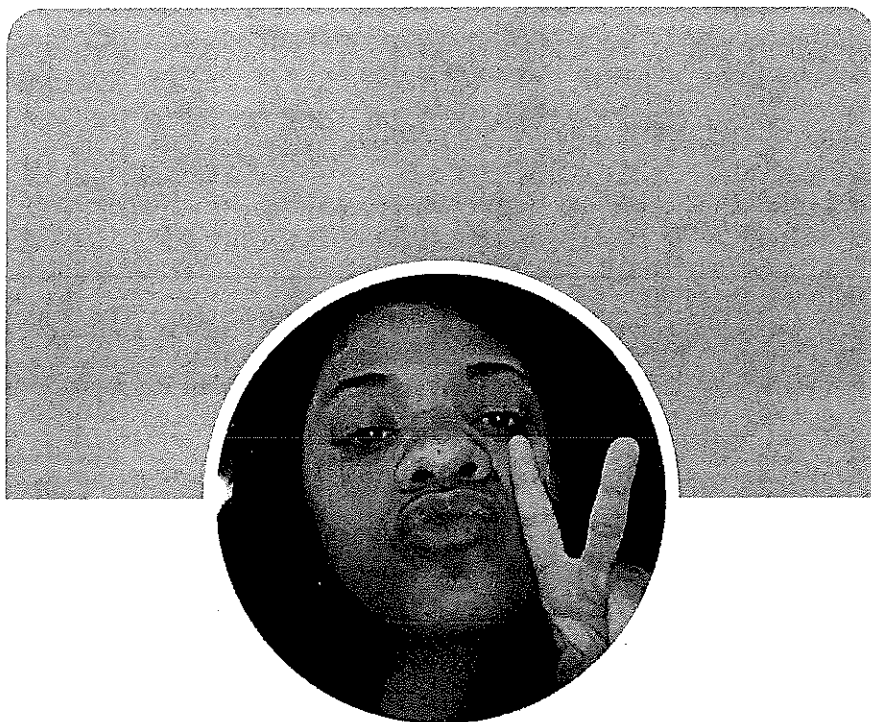
Menu



10:11



< Sarah Hutchens



Sarah Hutchens



Add Friend



Message



Works at Great Lakes Honda Special Finance Center



Went to Ellet High School



In a relationship



sarah8ch



onlyfans.com/iphonemytits



See Sarah's About Info



Home



Friends



Watch



Marketplace



Notifications



Menu

2:55

5G

 Add Friend

 Message



Works at Great Lakes Honda Special Finance Center



Went to Ellet High School



In a relationship



[onlyfans.com/iphonemytits](https://onlyfans.com/iphonemytits)



See Sarah's About Info

## Friends

14 mutual friends



Nicole Kay



Eriana Lenae



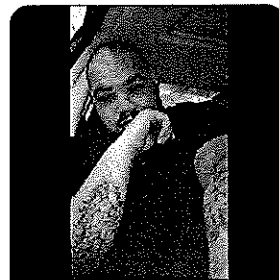
Cierra  
Cooper



Megan  
James



Jada Mowery



Tj Witts



Home



Friends



Watch



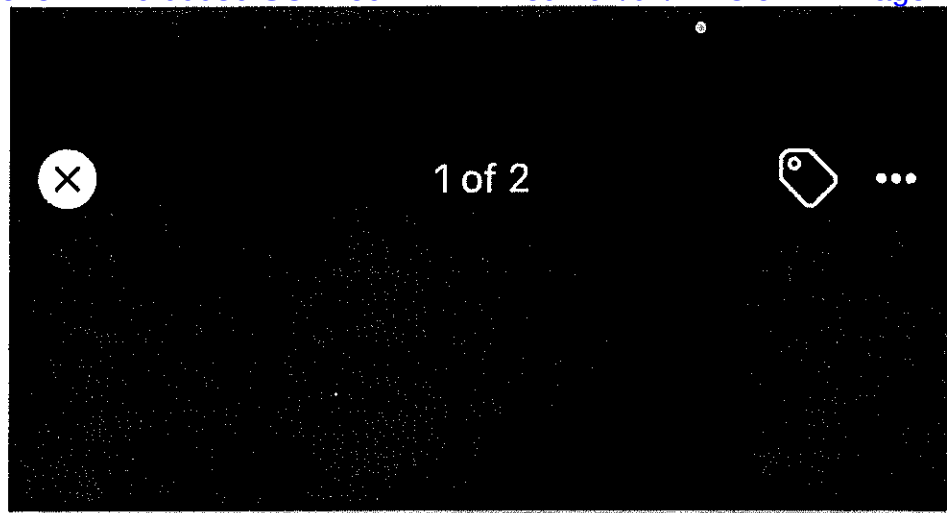
Marketplace



Notifications



Menu

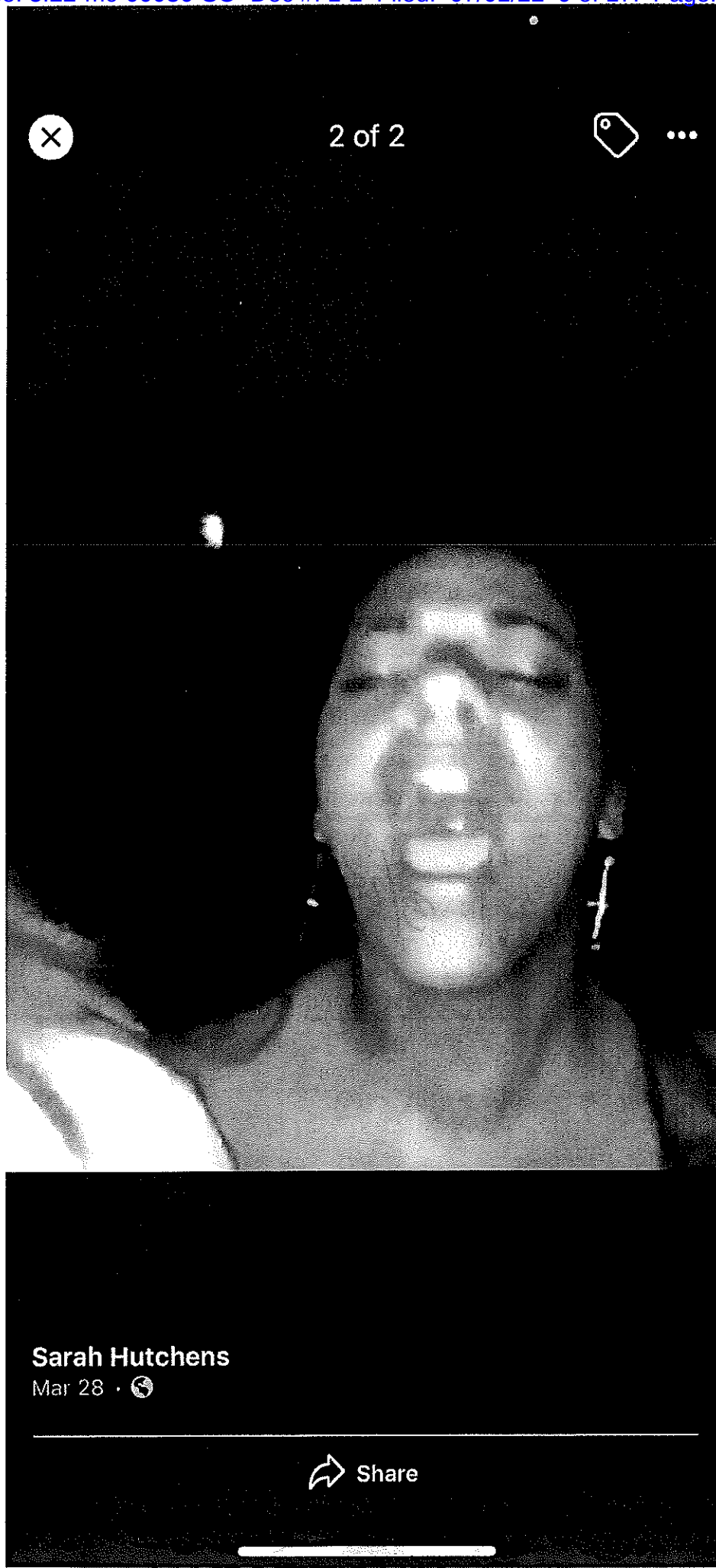


**Sarah Hutchens**  
5d · 🌐

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 Share



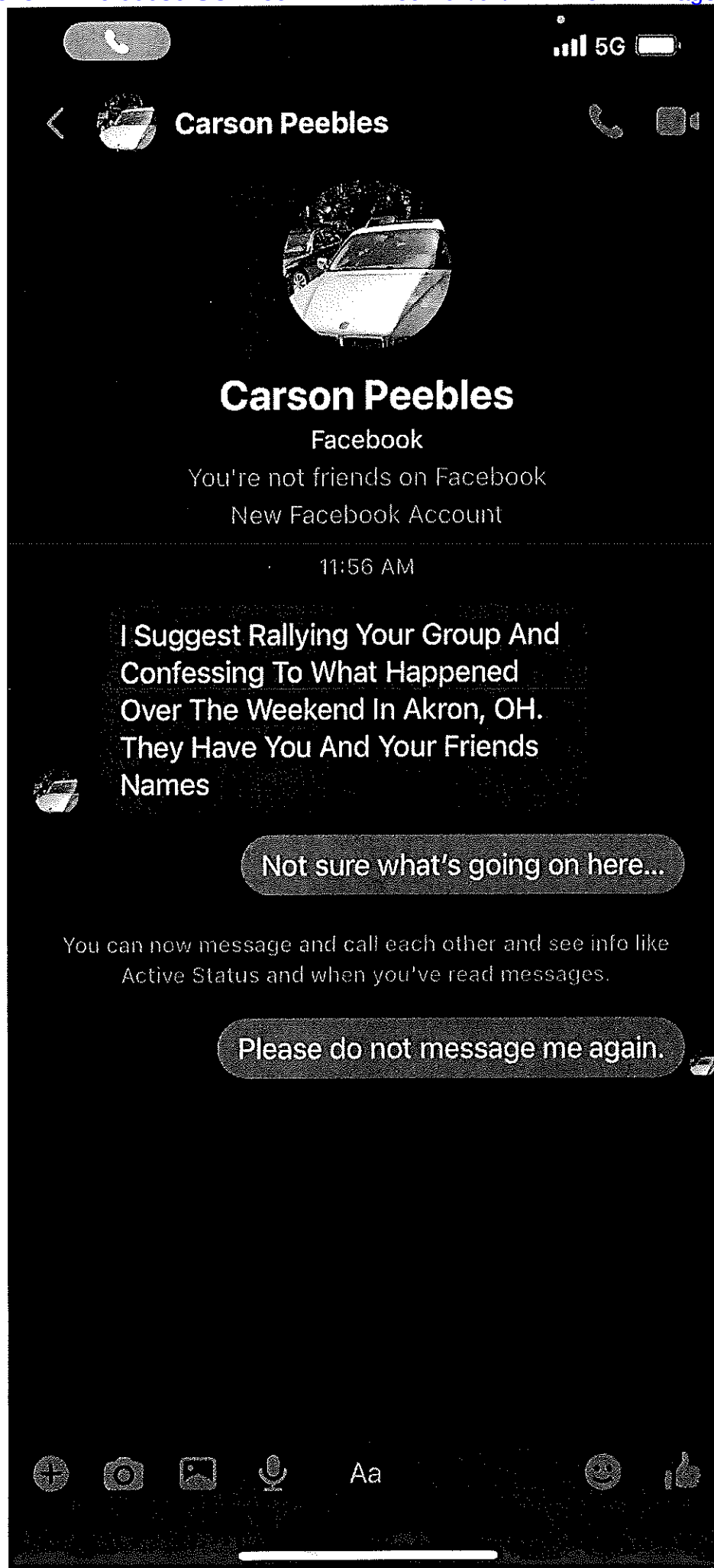


Account #2

Carson Peebles account:

<https://www.facebook.com/messages/t/100078966920414>

It was active from March 22, 2022 through March 28, 2022



12:11

**Carson Peebles**

40m ·

Target Store Powell Has An Extremely Discriminatory Employee Franchise As Well. Visiting About A Month Ago While In Town We Were Hostilely Treated At The Returns Desk And Ushered To Leave The Department Once We Asked To Speak To Management. Pitiful and Unprofessional. Don't Hire Immatured Teens



Like



Comment



Share

**Carson Peebles**

53m ·

Not The City I Remember Growing Up In



Like



Comment



Share

**Carson Peebles**

56m ·

Michael Peterson & Sarah Hutchins Of Great Lakes Honda Need To Be Charged With ASSAULT. There Entire Hands-On Automotive Team NEEDS Replaced Alongside. I've Lost Vehicles Due To There Services And We Will NOT Stay Silent About The Unprofessionalism Of One Of My Services Employee Choices. Save Your Company!



Like



Comment



Share



Home



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Marketplace



Groups



Notifications



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1:09




## Posts

 Photos



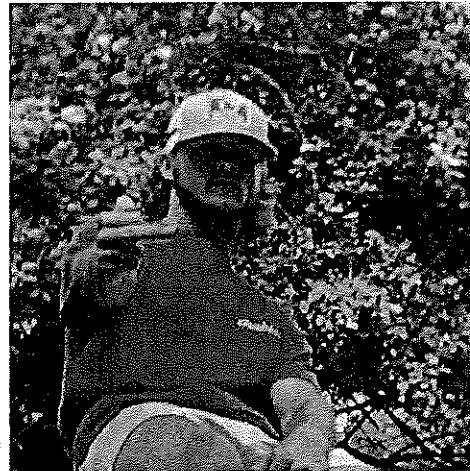
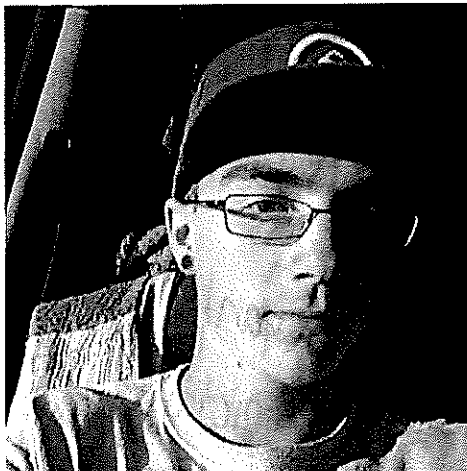
**Carson Peebles**



31m • 

ACentral And Northern Ohio Beware

DO NOT Hire These People If You Want To Keep Your Company Standing!!! Please Share!!! I Have A Follow Up On Each. Imve Stated My Complaints To The Companys Months On End. Not Even Authorities Have Helped On The Fraudelent Cases



Like



Comment



Share



**Carson Peebles**



Home



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Groups



Notifications



Menu

11:16



**Carson Peebles**



10h · 🌐



Like



Comment



Share



**Carson Peebles**

UnThey All Partake In  
Alcoholism And Drugs. Coked  
Up Rages And Brawls, Drug  
Paraphernalia On Social Pages,  
They Don't Recruit People Like  
The Old

7h Like Reply



**Carson Peebles**

Excuse That Some Are Terrible  
Owners While Others Are Poor  
Servic And Or Heinous Public

7h Like Reply



Write a comment...



Home



Marketplace



Groups



News



Notifications



Menu

3:07



Carson Peebles



9:00 PM  
STV



\*ALL TIMES ET - LOCAL BLACKOUTS MAY APPLY

@NBA



Like



Comment



Share



Carson Peebles



1h · 🌐

Mark Brumbaugh  
Katherine Smart  
Michael Pererson  
Deantre Williams  
Joe Huang  
Sarah Hutchens  
Spencer Adams  
Olivia Reed  
Jennavacia Morales  
John Cusack



Like



Comment



Share



Carson Peebles



2d · 🌐

A Pontoon From Cleveland The  
IX Boat Show 2021 Looking To  
Get Sold From Mogadore



Like



Comment



Share



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Marketplace



Pages



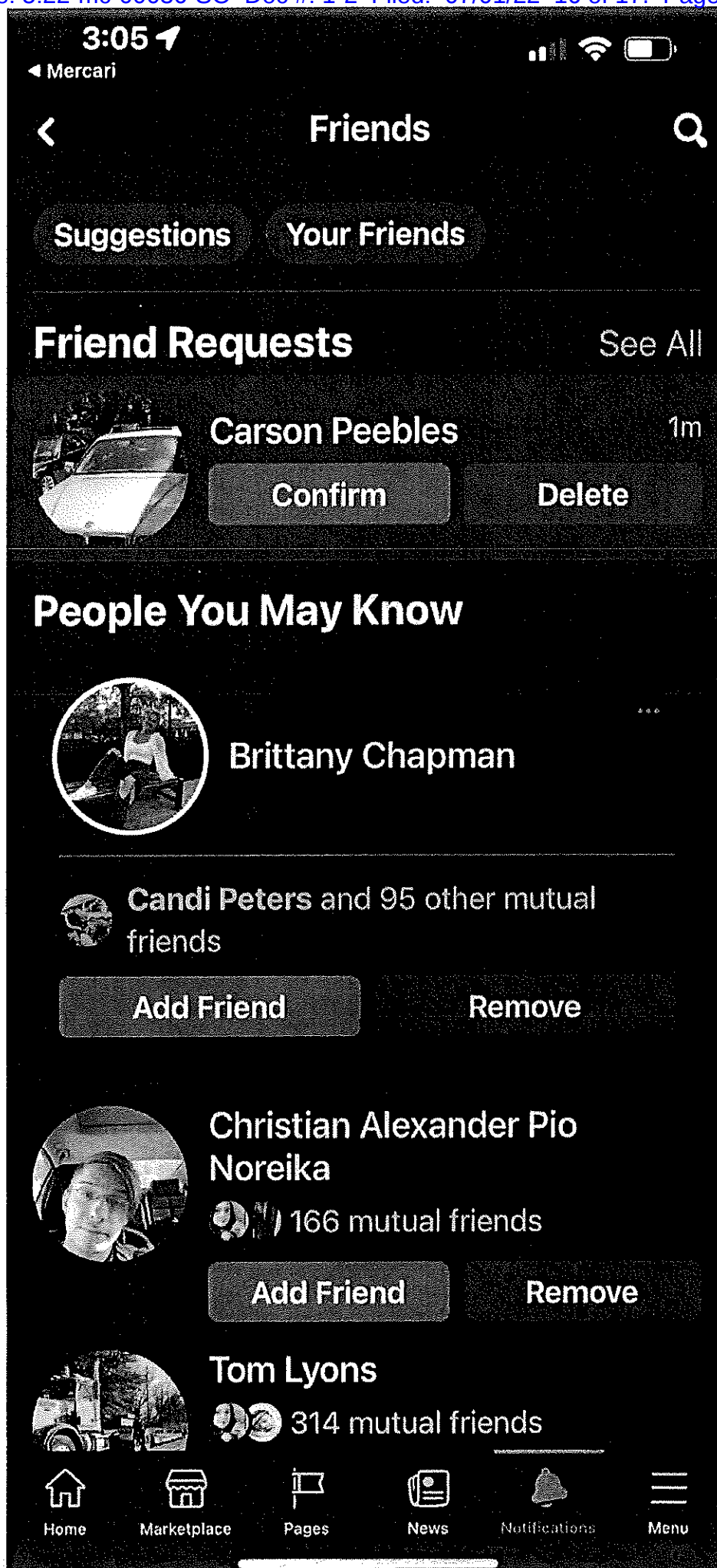
News



Notifications



Menu





9:35



## Support Message



Today at 1:31 AM

**We didn't take down Carson Peebles's post**

We know this is not what you wanted, and we thought it might help if we explain how the review process works.

Our technology helps us review reports first. This means we can find content that goes against our Community Standards quickly and reply to people in a reasonable period of time. Some reports, such as those that might contain child exploitation, are prioritized for review by our team.

Our technology reviewed your report and, ultimately, we decided not to take the content down. If you think we made a mistake, you can request another review. We'll use what you sent us to improve the technology and the reporting experience.

We understand that the content may be offensive or hurtful. Facebook is a global community, and people express themselves differently, but we only take down content that goes against our standards. We review and update our standards regularly, with the help of experts.

Thank you for helping to keep Facebook safe and welcoming for everyone.

[See options](#)

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